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IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
EASTERN DIVISION

SOUTHERN CALIFORNIA
EMERGENCY MEDICINE, INC.,

Plaintiff,

v.

WERFEL, et al.,

Defendants.

Case No. 5:23-cv-02450-FMO-DTB

**JOINT STIPULATION TO
EXTEND TIME FOR
SETTLEMENT CONFERENCE**

Hon. Fernando M. Olguin

Pursuant to Local Civil Rule 7-1, the Parties hereby stipulate and request to extend time to mediate from September 20, 2024, to October 4, 2024. In support of this request, the Parties state as follows:

The Court entered a Case Management Order setting a deadline to mediate by August 2, 2024. *See* Dkt. 34 at 2. The parties selected Dr. Joan Kessler as a settlement officer. *See* Dkt. 38 (stipulation re selection). Based on the mediator's dates of availability, they were prepared to proceed with mediation on July 31, 2024. But on July 24, 2024, JAMS informed the parties that, "Due to an unforeseen calendar conflict, Dr. Kessler would like to reschedule [the July 31] mediation."

1 The parties rescheduled for September 17, 2024, and the Court extended the
2 deadline to mediate until September 20 to accommodate this scheduling change.
3 *See* Order, Dkt. 41.

4 Then, on August 8, 2024, JAMS again notified counsel that “Due to a
5 scheduling conflict, Dr. Kessler is not longer available to mediate on September
6 17, 2024.” The parties again conferred on potential mediation dates and eventually
7 selected September 30, 2024. They are presently confirmed for mediation on
8 September 30, 2024, at 10:00 AM before Dr. Joan Kessler (JAMS).

9 To accommodate the mediator’s unforeseen scheduling change, the parties
10 now seek another extension of the deadline to mediate. They ask to extend that
11 deadline by approximately two weeks, from September 20 to October 4. That
12 extension provides sufficient time to complete the mediation and file a status report
13 thereafter. This request should not require any additional change to the Court’s
14 schedule.

15 A proposed order is provided for the convenience of the Court per Local
16 Rule 52.4.1.

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18 Dated: September 16, 2024.

19
20 Respectfully submitted,

21 /s/ Peter A. Arhangelsky
22 Peter A. Arhangelsky
GREENBERG TRAURIG, LLP

23 Attorney for Plaintiff Southern California
24 Emergency Medicine, Inc.

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/s/
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Attorneys for Defendants United States of
America; Daniel Werfel, in his official
capacity as Commissioner of the United
States Internal Revenue Service; the United
States Internal Revenue Service; Janet
Yellen, in her official capacity as Secretary
of the Treasury; the United States
Department of Treasury

ATTESTATION OF FILER

I attest that the other signatory listed, on whose behalf this filing is submitted,
concurs in the filing's content and has authorized the filing.

Dated: September 16, 2024

/s/ Peter A. Arhangelsky
Peter A. Arhangelsky